

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

JUSTIN PAUL KEE (1);
MICHAEL HSU (2);
CHRISTHIAN DAMIAN ROJAS (3);

ABELARDO SALAS-FUENTES (6);
OMAR ARGUELLES
aka MIGUEL GARCIA (7);
JESUS ALMENDAREZ (8);

MARIO PIZANO RIVERA
aka PALETA (11);
GUILLERMO RENE RIVERA (12);
JUAN GABRIEL BETANCOURT (13);
JORGE LUIS BETANCOURT (14);
NESTOR VALENCIA-CASAS (15);
PEDRO CASTILLO (16);
JOSE GOMEZ-ASUNCION (17);
LUIS MIGUEL MARTINEZ-CABRERA
aka FANTASMA (18)
FRANKLIN DE JESUS
DOMINGUEZ (19); and
IVIS OLVERA (20)

Criminal No. 18 CR-721

United States Courts
Southern District of Texas
FILED

DEC 19 2018

David J. Bradley, Clerk of Court

UNDER SEAL

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Conspiracy to Possess with Intent to Distribute Methamphetamine

On or about July 27, 2016, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,

**JUSTIN PAUL KEE (1) and
MICHAEL HSU (2),**

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to possess with the intent to distribute a controlled substance, that is fifty (50) grams or more methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWO

Possession with Intent to Distribute Methamphetamine

On or about July 27, 2016, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,

**JUSTIN PAUL KEE (1) and
MICHAEL HSU (2),**

aiding, abetting and assisting others known and unknown to the Grand Jury, did

knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is fifty (50) grams or more methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THREE

Possession with Intent to Distribute Methamphetamine

On or about August 31, 2016, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

MICHAEL HSU (2),

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is fifty (50) grams or more methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FOUR

Conspiracy to Possess with Intent to Distribute Cocaine

On or about October 6, 2016, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,

**MICHAEL HSU (2) and
CHRISTHIAN ROJAS (3),**

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to possess with the intent to distribute a controlled substance, that is five hundred (500) grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FIVE

Possession with Intent to Distribute Cocaine

On or about October 6, 2016, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

CHRISTHIAN ROJAS (3),

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is five hundred (500) grams or more of a mixture and

substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT SIX

Possession with Intent to Distribute Cocaine

On or about October 26, 2016, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

MICHAEL HSU (2),

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is five hundred (500) grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT SEVEN

Possession with Intent to Distribute Methamphetamine

On or about October 26, 2016, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the

defendant,

MICHAEL HSU (2),

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is fifty (50) grams or more methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT EIGHT

Possession with Intent to Distribute Methamphetamine

On or about October 26, 2016, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

MICHAEL HSU (2),

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is fifty (50) grams or more methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable

amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT NINE

Conspiracy to Possess with Intent to Distribute Methamphetamine

On or about November 30, 2016, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,



did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to possess with the intent to distribute a controlled substance, that is fifty (50) grams or more methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TEN

Possession with Intent to Distribute Methamphetamine

On or about November 30, 2016, in the Houston Division of the Southern

District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

[REDACTED]

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is fifty (50) grams or more of methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT ELEVEN

Possession with Intent to Distribute Methamphetamine

On or about November 30, 2016, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

[REDACTED]

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is fifty (50) grams or more of methamphetamine and five

hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWELVE

Conspiracy to Possess with Intent to Distribute Methamphetamine

On or about November 15, 2017, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,


ABELARDO SALAS-FUENTES (6),

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to possess with the intent to distribute a controlled substance, that is fifty (50) grams or more methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THIRTEEN

Possession with Intent to Distribute Methamphetamine

On or about November 15, 2017, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,



ABELARDO SALAS-FUENTES (6),

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is fifty (50) grams or more of methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FOURTEEN

Conspiracy to Possess with Intent to Distribute Methamphetamine

On or about March 28, 2018, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,


**ABELARDO SALAS-FUENTES (6),
OMAR ARGUELLES aka MIGUEL GARCIA (7);**

JESUS ALMENDAREZ (8); and
[REDACTED]

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to possess with the intent to distribute a controlled substance, that is fifty (50) grams or more methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FIFTEEN

Possession with Intent to Distribute Methamphetamine

On or about March 28, 2018, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,

[REDACTED]
**ABELARDO SALAS-FUENTES (6),
OMAR ARGUELLES aka MIGUEL GARCIA (7);
JESUS ALMENDAREZ (8); and**
[REDACTED]

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is fifty (50) grams or more of methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable

amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT SIXTEEN

Conspiracy to Possess with Intent to Distribute Heroin

On or about May 22, 2018, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,

ABELARDO SALAS-FUENTES (6),

MARIO PIZANO RIVERA aka PALETA (11);

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to possess with the intent to distribute a controlled substance, that is one (1) kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

Possession with Intent to Distribute Heroin

On or about May 22, 2018, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,

ABELARDO SALAS-FUENTES (6)

MARIO PIZANO RIVERA aka PALETA (11);

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is one (1) kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT EIGHTEEN

Possession with Intent to Distribute Heroin

On or about May 22, 2018, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

MARIO PIZANO RIVERA aka PALETA (11),

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is fifty (50) grams or more of methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code,

Section 2.

COUNT NINETEEN

Assault on a Federal Officer

On or about May 22, 2018, in the Houston Division of the Southern District of Texas, the defendant,

MARIO PIZANO RIVERA aka PALETA (11),

did then and there, unlawfully, knowingly and forcibly assault, resist, oppose, impede, intimidate and interfere with Ron Morrison, a United States Drug Enforcement Administration employee, while he was engaged in his official duties, and such acts by the defendant involved the intent to commit another felony and involved the use of a deadly and dangerous weapon, in violation of Title 18, United States Code, Sections 111(a)(1), (a)(2) and (b).

COUNT TWENTY

Conspiracy to Possess with Intent to Distribute Cocaine

On or about June 28, 2018, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,

**GUILLERMO RENE RIVERA (12) and
JUAN GABRIEL BETANCOURT (13),**

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to possess with the intent

to distribute a controlled substance, that is five hundred (500) grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT TWENTY-ONE

Possession with Intent to Distribute Cocaine

On or about June 28, 2018, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,

**GUILLERMO RENE RIVERA (12) and
JUAN GABRIEL BETANCOURT (13),**

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is five hundred (500) grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT TWENTY-TWO

Felon in Possession of a Firearm

On or about June 28, 2018, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

GUILLERMO RENE RIVERA (12),

having been previously convicted of a crime that is punishable by a term of imprisonment in excess of one year, aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly possess, in and affecting foreign and interstate commerce, a firearm, that is a Sig Sauer P290, 9mm handgun, Serial Number 25B013065, said firearm having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1), and Title 18, United States Code, Section 2.

COUNT TWENTY-THREE

Possession with Intent to Distribute Marijuana

On or about June 28, 2018, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

JUAN GABRIEL BETANCOURT (13),

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is one hundred (100) kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT TWENTY-FOUR

Assault on a Federal Officer

On or about June 28, 2018, in the Houston Division of the Southern District of Texas, the defendant,

JORGE LUIS BETANCOURT (14),

did then and there, unlawfully, knowingly and forcibly assault, resist, oppose, impede, intimidate and interfere with Gilberto Lopez, a United States Federal Bureau of Investigation employee, while he was engaged in his official duties, and such acts by the defendant involved the intent to commit another felony and involved the use of a deadly and dangerous weapon, in violation of Title 18, United States Code, Sections 111(a)(1), (a)(2) and (b).

COUNT TWENTY-FIVE

Assault on a Federal Officer

On or about June 28, 2018, in the Houston Division of the Southern District of Texas, the defendant,

JORGE LUIS BETANCOURT (14),


did then and there, unlawfully, knowingly and forcibly assault, resist, oppose, impede, intimidate and interfere with Gary Bender, a task force officer with the United States Federal Bureau of Investigation, while he was engaged in his official

duties, and such acts by the defendant involved the intent to commit another felony and involved the use of a deadly and dangerous weapon, in violation of Title 18, United States Code, Sections 111(a)(1), (a)(2) and (b).

COUNT TWENTY-SIX

Conspiracy to Possess with Intent to Distribute Heroin

On or about July 3, 2018, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,


**NESTOR VALENCIA-CASAS (15),
PEDRO CASTILLO (16), and
JOSE GOMEZ-ASUNCION (17),**

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to possess with the intent to distribute a controlled substance, that is one hundred (100) grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT TWENTY-SEVEN

Possession with Intent to Distribute Heroin

On or about July 3, 2018, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,

**NESTOR VALENCIA-CASAS (15),
PEDRO CASTILLO (16), and
JOSE GOMEZ-ASUNCION (17),**

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is one hundred (100) grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT TWENTY-EIGHT

Conspiracy to Possess with Intent to Distribute Heroin

On or about August 16, 2018, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

LUIS MIGUEL MARTINEZ-CABRERA aka FANTASMA (18),

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to possess with the intent to distribute a controlled substance, that is one hundred (100) grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT TWENTY-NINE

Possession with Intent to Distribute Heroin

On or about August 16, 2018, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,

LUIS MIGUEL MARTINEZ-CABRERA aka FANTASMA (18),

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is one hundred (100) grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT THIRTY

Conspiracy to Possess with Intent to Distribute Heroin

On or about September 18, 2018, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

**LUIS MIGUEL MARTINEZ-CABRERA aka FANTASMA (18),
and FRANKLIN DE JESUS DOMINGUEZ (19),**

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to possess with the intent

to distribute a controlled substance, that is one (1) kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THIRTY-ONE

Possession with Intent to Distribute Heroin

On or about September 18, 2018, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,

**LUIS MIGUEL MARTINEZ-CABRERA aka FANTASMA (18),
and FRANKLIN DE JESUS DOMINGUEZ (19),**

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is one (1) kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THIRTY-TWO

Possession with Intent to Distribute Heroin

On or about October 19, 2018, in the Houston Division of the Southern

District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

IVIS OLVERA (20),

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is one hundred (100) grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

NOTICE OF CRIMINAL FORFEITURE

(Title 21 U.S.C. § 853)

Pursuant to Title 21, United States Code, Section 853, the United States gives notice to the defendants,

**JUSTIN PAUL KEE (1),
MICHAEL HSU (2),
CHRISTHIAN DAMIAN ROJAS (3),**

**ABELARDO SALAS-FUENTES (6),
OMAR ARGUELLES aka MIGUEL GARCIA (7),
JESUS ALMENDAREZ (8),**

**MARIO PIZANO RIVERA aka PALETA (11),
GUILLERMO RENE RIVERA (12),
JUAN GABRIEL BETANCOURT (13),**

**JORGE LUIS BETANCOURT (14),
NESTOR VALENCIA-CASAS (15),
PEDRO CASTILLO (16),
JOSE GOMEZ-ASUNCION (17),
LUIS MIGUEL MARTINEZ-CABRERA aka FANTASMA (18),
FRANKLIN DE JESUS DOMINGUEZ (19), and
IVIS OLVERA (20),**

that in the event of conviction of an offense in violation of Title 21, United States Code, Sections 841 or 846, as charged in this Indictment, the following is subject to forfeiture:

- (1) all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense; and
- (2) all property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense.

Notice of Criminal Forfeiture

[18 U.S.C. § 924(d) and 28 U.S.C. §2461(c)]

Pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), the United States gives notice to the defendant,

GUILLERMO RENE RIVERA (12),

that in the event of a conviction of an offense in violation of Title 18, United States Code, Section 922(g), as charged in Count Twenty-Two of this Indictment, the following is subject to forfeiture:

Any firearms and ammunition involved in or used in any knowing violation of section 922(g).

Property Subject to Forfeiture

Defendants are notified that the property subject to forfeiture includes, but is not limited to:

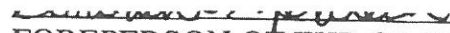
- (1) Sig Sauer P290, 9mm handgun, Serial Number 25B013065.

In the event that a condition listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendants in substitution up to the total value of the property subject to forfeiture.

The United States may seek the imposition of a money judgment.

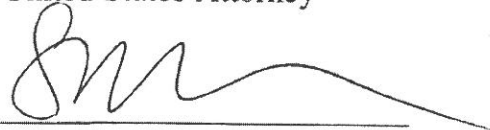
A TRUE BILL

ORIGINAL SIGNATURE ON FILE


FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK
United States Attorney

By:



SHARAD S. KHANDELWAL
CAROLYN FERKO
MICHAEL DAY
Assistant United States Attorneys

AO 142 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

United States of America

v.
Justin Paul Kee

Case No. 4:18cr721

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

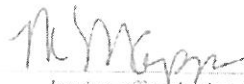
(name of person to be arrested) Justin Paul Kee

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment
 ☐ Superseding Indictment
 ☐ Information
 ☐ Superseding Information
 ☐ Complaint
☐ Probation Violation Petition
☐ Supervised Release Violation Petition
☐ Violation Notice
☐ Order of the Court

This offense is briefly described as follows:

- Ct. 1: Conspiracy to Possess with Intent to Distribute Methamphetamine [21USC846,841(a)(1)841(b)(1)(A)and 18USC2
 Ct. 2: Possession with Intent to Distribute Methamphetamine [21USC841(a)(1)841(b)(1)(A)and 18USC2

Date: 12/19/2018


Issuing officer's signature

City and state: Houston, TX

M. Mapps, Deputy Clerk

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____

Date: _____

Arresting officer's signature

Printed name and title

FD# 10772678